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**VIA ECF**

The Honorable Diane Gujarati  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East, Courtroom 4B South  
Brooklyn, New York 11201

Re: Jeffrey Struggs v. Wells Fargo Bank, N.A., et al.,  
Case No. 1:23-cv-328-DG-PK

Dear Judge Gujarati:

This firm represents Defendant Select Portfolio Servicing, Inc. ("Defendant" or "SPS") in the above-referenced action. We write to respectfully request a third 30-day enlargement of time, from March 26, 2023 until April 25, 2023, for SPS to answer or otherwise respond to Plaintiff's Complaint.

The instant enlargement of time is requested so that we may continue settlement discussions with Plaintiff to determine whether this matter can be resolved.

Prior to filing the instant application, the undersigned conferred with James Tierney, Esq., Plaintiff's counsel. Mr. Tierney consented to this request. This is the third request for an extension of the deadline for Defendant to respond to the Complaint.

We thank Your Honor for your consideration of this matter.

Respectfully Submitted,

HINSHAW & CULBERTSON LLP

/s/ Ashley R. Newman

Ashley R. Newman

cc: **VIA ECF**  
All Counsel of Record